

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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Counsel for Debtor

In Re:

HENRY BELL, JR.,  
Debtor.

Case No.: 22-15432

Judge: RG

Chapter: 13

**APPLICATION FOR RETENTION OF PROFESSIONAL**

1. The applicant, Henry Bell, Jr., is the (check all that apply):

☐ Trustee: ☐ Chap. 7 ☐ Chap. 11 ☐ Chap. 13.

☒ Debtor: ☐ Chap. 11 ☒ Chap. 13

☐ Official Committee of \_\_\_\_\_

2. The applicant seeks to retain the following professional Rosenberg, Minc, Falkoff & Wolff, LLP ("RMFW") to serve as (check all that apply):

☐ Attorney for: ☐ Trustee ☐ Debtor-in-Possession

☐ Official Committee of \_\_\_\_\_

☐ Accountant for: ☐ Trustee ☐ Debtor-in-possession

☐ Official Committee of \_\_\_\_\_

☒ Other Professional:

☐ Realtor

☐ Appraiser

☒ Special Counsel

☐ Auctioneer

☐ Other (specify): \_\_\_\_\_

3. The employment of the professional is necessary because:

RMFW is representing the Debtor in a personal injury action that was filed prior to the bankruptcy case in the Superior Court of New Jersey Law Division, Essex County, captioned Henry Bell, Jr., v. New Jersey Transit Rail Operations, Inc. (the "PI Action").

4. The professional has been selected because:

The lead attorney on the matter at RMFW, Robert H. Wolff, Esq., is an experienced personal injury attorney who has been practicing personal injury law for many years, obtaining millions of dollars in verdicts and settlements for his clients.

5. The professional services to be rendered are as follows:

RMFW will continue to represent the Debtor in the PI Action through its conclusion.

6. The proposed arrangement for compensation is as follows:

Contingency fee of 33 1/3% of the sum recovered, whether by judgment, settlement, or otherwise. Firm agrees to pay for all costs and expenses, regardless of outcome.

Percentage is computed on gross sum recovered before deducting expenses. See attached retainer agreement for full scope and terms of proposed compensation agreement.

7. To the best of the applicant's knowledge, the professional's connection with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☐ None

☒ Describe connection: Represented the Debtor in the PI Action prior to the filing of the captioned bankruptcy case.

8. To the best of the applicant's knowledge, the professional (check all that apply):

☒ does not hold an adverse interest to the estate.

☒ does not represent an adverse interest to the estate.

☒ is a disinterested person under 11 U.S.C. § 101(14).

☒ does not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which he/she will be retained under 11 U.S.C. § 327(e).

☐ Other; explain: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

The applicant respectfully requests authorization to employ the professional to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may determine and allow.

Date: August 23, 2022

/s/ Moshie Solomon  
Counsel for Debtor